

## **REMARKS**

Claims 5-10 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

## **CLAIM OBJECTIONS**

Claims 6-8 stand objected to because of an informality. Claims 6-8 are amended to depend on claim 5. Accordingly, this objection should be moot.

## **REJECTION UNDER 35 U.S.C. § 103**

Claims 5-7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Samworth (U.S. Pat. No. 6,213,018) in view of Suzuki (U.S. Pat. No. 5,279,858). Claim 8 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Samworth (U.S. Pat. No. 6,213,018) in view of Suzuki (U.S. Pat. No. 5,279,858) in view of Dadowski (U.S. Pat. No. 4,152,986). Claims 9-10 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Samworth (U.S. Pat. No. 6,213,018), Suzuki (U.S. Pat. No. 5,279,858), and Zhang (U.S. Pat. No. 6,396,470) in view of Tanada (EP 1 189 097 A2).

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These rejections are respectfully traversed.

Claims 5 and 9 call for at least two of the following to be **substantially equal**:

- a first predetermined pitch of the color filters on a front side of a substrate;
- a second pitch of meshes formed on a surface of an anilox roller; and
- a third pitch of meshes formed on a surface of a projection.

The office action states that it would have been obvious to one of ordinary skill in the art at the time the invention was made to have the predetermined pitch of color filters, the pitch of meshes on a surface of the anilox roller, and a pitch of meshes on a surface of the projections **substantially equal** because, as noted in Samworth (Col 2, Lines 19-25) “[d]ue to product competition, the market requirements on the printing quality of ... images ... are becoming very stringent. There is thus a need for flexographic printing plates that ... deliver a better quality image.”

Applicant respectfully submits that the teachings of Samworth are insufficient to provide the requisite motivation to arrive at the claimed subject matter wherein the recited pitches are **substantially equal**. More specifically, the above statement by Samworth is so broad and general that it does not reasonably suggest to the skilled practitioner the claimed method wherein at least two of the three pitches itemized above are **substantially equal**. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art. There is no explicit or implicit teaching, suggestion, or motivation in Samworth to provide the claimed pitches. To conclude to the contrary must be the result of impermissible hindsight reasoning based on the Applicant’s disclosure. The prior art is completely silent with respect to the problem solved by the claimed invention. That is, the color

filters with the same-color pitch, the marks of the meshes of the anilox roller, and the marks of the meshes on the projections of the letter press interfere with one another and cause moiré.

Moreover, Samworth teaches away from the claimed substantially equal pitches by stating that the rows and columns of the cells of the flexography plate ink carrying cells form an acute angle with the rows and columns of the cells of the anilox roll cell array respectively. The proposed modification of Samworth to arrive at the claimed invention would render Samworth unsatisfactory for this purpose. This modification would also change the principle of operation of Samworth. A finding of obviousness cannot be based on such teachings.

Claims 6 and 10 further define the subject matter of claims 5 and 9 respectively by reciting that the predetermined pitch of the color filters, the second pitch of meshes formed on the surface of the anilox roller, and the third pitch of meshes formed on the surface of the projection are substantially equal. Inasmuch as the prior art fails to teach or suggest the recitations of claims 5 and 9, applicant respectfully submits that the prior art also fails to teach or suggest the subject matter of claims 6 and 10 wherein all three pitches are substantially equal.

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Claims 7 and 8 depend from claim 5. Applicant respectfully submits that these claims are allowable over the prior art for at least the same reasons as set forth above with respect to base claim 5.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

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